

EXHIBIT E

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

KYKO GLOBAL, INC., a Canadian corporation, KYKO GLOBAL GmbH, a Bahamian corporation, PRITHVI SOLUTIONS, INC., a Delaware Corporation

Plaintiffs,

v.

PRITHVI INFORMATION SOLUTIONS, LTD, an Indian corporation, VALUE TEAM CORPORATION, a British Virgin Islands corporation, SSG CAPITAL PARTNERS I, L.P., a Cayman Islands Limited Partnership, SSG CAPITAL MANAGEMENT (HONG KONG) LIMITED, a private Hong Kong company, MADHAVI VUPPALAPATI, an individual, ANANDHAN JAYARAMAN, an Individual, SHYAM MAHESHWARI, an individual, IRA SYAVITRI NOOR A/K/A IRA NOOR VOURLOUMIS, an individual, DINESH GOEL, an individual, WONG CHING HIM a/k/a Edwin Wong, an individual, ANDREAS VOURLOUMIS, an individual, PRITHVI ASIA SOLUTIONS LIMITED, a Hong Kong company

Defendants.

Case No. 2:18-cv-1290-WSS

PLAINTIFFS' INITIAL DISCLOSURES PURSUANT TO RULE 26(a)(1)

Kyko Global Inc., Kyko Global GmbH, and Prithvi Solutions Inc. (collectively “Plaintiffs”) state the following as their Initial Disclosures pursuant to Rule 26(a)(1):

In making these Initial Disclosures, Plaintiffs do not waive any applicable privilege.

Plaintiffs do not concede the relevancy of any information contained in or derived from these

Initial Disclosures, and expressly reserve the right to object to the admissibility at trial of any of

the information contained in or derived from these Initial Disclosures. Plaintiffs make these Initial Disclosures based on the information reasonably available to them at this time. Plaintiffs reserve the right to supplement or amend these Initial Disclosures as additional information becomes available and is learned through the discovery process. Plaintiffs further reserve the right to rely upon the individuals identified in these Initial Disclosures for subjects other than those identified herein in response to evidence and testimony presented.

Rule 26(a)(1)(A)(i)

The name and, if known, the address and telephone number of each individual likely to have discoverable information--along with the subjects of that information--that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;

1. Kiran Kulkarni
c/o Plaintiffs' Counsel

Mr. Kulkarni has knowledge of the facts and allegations contained in the Complaint, RICO Case Statement, and Plaintiffs' submissions in this proceeding. Mr. Kulkarni also has information pertaining to the U.S. District Court for the Western District of Washington Case No. 2:13-cv-1034 – MJP and Washington Superior Court Case No. 13-2-41165-2 SEA that may be relevant to this case.

2. Audrey Koocher
56 Pondfield Road West, #4B, Bronxville, NY 10708
+1 914 831 8277

Ms. Koocher has knowledge of the facts and allegations contained in the Complaint and RICO Case Statement.

3. Guru Pandyar
+1 412 320 0238
pandyarguru@gmail.com

Mr. Pandyar has knowledge of the facts and allegations contained in the Complaint and RICO Case Statement as well as U.S. District Court for the Western District of Washington Case No. 2:13-cv-1034 that may be relevant to this case.

4. David Amorose
+1 412-951-8737
DJAmorose@yahoo.com

Mr. Amorose has knowledge of the facts and allegations contained in the Complaint and RICO Case Statement.

5. Satish Vuppalapati
+91 955-029-0909
satish@prithvisolutions.com
vuppalapatis@gmail.com

Address: H. No. 1235, Road No. 60,
Jubilee Hills, Hyderabad, Telangana, India

96, Chikoti Gardens, Beegumpet, Hyderabad, Telangana, India

Prithvi Information Solutions Ltd.
Prithvi House,
2-56/2/19, Near Thanda,
Khanamet, HITEC City, Madhapur,
Hyderabad - 500 081

Mr. Vuppalapati has knowledge of the facts and allegations contained in the Complaint, RICO Case Statement, and the Defendants' submissions in this proceeding. Mr. Vuppalapati also has information pertaining to the U.S. District Court for the Western District of Washington Case No. 2:13-cv-1034 – MJP and Washington Superior Court Case No. 13-2-41165-2 SEA that may be relevant to this case.

6. Madhavi Vuppalapati
madhavi@prithvisolutions.com
vuppalapatim@gmail.com
96, Chikoti Gardens, Beegumpet, Hyderabad, Telangana, India

c/o Adv. Rao & Associates, Advocates, Mr. M. Venketshwar Rao, V. Ashwani Kumar, M. Dasharath, Office at – 16-11-16/86/B, Shri Puram Colony, Malakpet, Hyderabad.
(Cell No. +91 93945 52685)

Prithvi Information Solutions Ltd.
Prithvi House,
2-56/2/19, Near Thanda,

Khanamet, HITEC City, Madhapur,
Hyderabad - 500 081

Ms. Vuppalapati has knowledge of the facts and allegations contained in the Complaint, RICO Case Statement, and the Defendants' submissions in this proceeding. Ms. Vuppalapati also has information pertaining to the U.S. District Court for the Western District of Washington Case No. 2:13-cv-1034 – MJP and Washington Superior Court Case No. 13-2-41165-2 SEA that may be relevant to this case.

7. Prithvi Information Solutions Ltd.

satish@prithvisolutions.com, madhavi@prithvisolutions.com
96, Chikoti Gardens, Beegumpet, Hyderabad, Telengana, India

214 S. Craig Street Suite 5 Pittsburgh, PA 15213

c/o Adv. Rao & Associates, Advocates, Mr. M. Venketshwar Rao, V. Ashwani Kumar, M. Dasharath, Office at – 16-11-16/86/B, Shri Puram Colony, Malakpet, Hyderabad.
(Cell No. +91 93945 52685)

Prithvi Information Solutions Ltd.
Prithvi House,
2-56/2/19, Near Thanda,
Khanamet, HITEC City, Madhapur,
Hyderabad - 500 081

Prithvi Information Solutions Ltd ("PISL") has knowledge of the facts and allegations contained in the Complaint, RICO Case Statement, and the Defendants' submissions in this proceeding. PISL also has information pertaining to the U.S. District Court for the Western District of Washington Case No. 2:13-cv-1034 – MJP and Washington Superior Court Case No. 13-2-41165-2 SEA that may be relevant to this case.

8. Prithvi Asia Solutions Limited.

satish@prithvisolutions.com, madhavi@prithvisolutions.com

214 S. Craig Street Suite 5 Pittsburgh, PA 1521

96, Chikoti Gardens, Beegumpet, Hyderabad, Telengana, India

c/o Adv. Rao & Associates, Advocates, Mr. M. Venketshwar Rao, V. Ashwani Kumar, M. Dasharath, Office at – 16-11-16/86/B, Shri Puram Colony, Malakpet, Hyderabad.
(Cell No. 93945 52685)

Prithvi Information Solutions Ltd.
Prithvi House,
2-56/2/19, Near Thanda,
Khanamet, HITEC City, Madhapur,
Hyderabad - 500 081

Prithvi Asia Solutions Limited ("PASL") has knowledge of the facts and allegations contained in the Complaint, RICO Case Statement, and the Defendants' submissions in this proceeding. PASL also has information pertaining to the U.S. District Court for the Western District of Washington Case No. 2:13-cv-1034 – MJP and Washington Superior Court Case No. 13-2-41165-2 SEA that may be relevant to this case.

9. Value Team Corporation

Value Team Corporation, formerly a struck-off British Virgin Islands' corporation that was allegedly restored on September 1, 2020 - has knowledge of the facts and allegations contained in the Complaint, RICO Case Statement, and the Defendants' submissions in this proceeding.

10. P.K. Ram & Associates

3240 E State, St. Hamilton, New Jersey 08619
Phone: 609-631-9552

P.K. Ram & Associates were PISL's and Prithvi Solutions Inc.'s ("PSI") former auditors. This firm has information pertaining to the accounts receivable showing on these entities' books and records and have performed audits with respect to same.

11. SSG Capital Partners I, L.P., SSG Capital Management (Hong Kong) Limited n/k/a Ares Management Corporation, Ares Management Corporation, Shyam Maheshwari, Ira Syavitri Noor a/k/a Ira Noor Vourloumis, Dinesh Goel, Wong Ching Him a/k/a Edwin Wong, and Andreas Vourloumis, Peter Cairns, Nigel Stead.

c/o JONES DAY
500 Grant Street, Suite 4500
Pittsburgh, PA 15219-2514
Telephone: (412) 391-3939
Facsimile: (412) 394-7959
Email: jdgoetz@jonesday.com

These people and entities have knowledge of the facts and allegations contained in the Complaint and RICO Case Statement and Defendants' submissions in this case.

12. Anandhan Jayarman

c/o Jeffrey T. Morris, Esquire
6425 Living Place, Suite 200
Pittsburgh, PA 15206
morris@elliott-davis.com
Tel: (412) 434.4911, ext. 34
Fax: (412) 774.2168

Mr. Jayarman has knowledge of the facts and allegations contained in the Complaint and RICO Case Statement and Defendants' submissions in this case.

13. Lehman Brothers Holdings Inc.

c/o The Prentice-Hall Corp. System, Inc.,
Registered Agent,
80, State Street, Albany, NY 12207

c/o Corporation Service Co.,
Registered Agents
2711, Centreville Road, Suite 400
Wilmington DE 19808
Tel : 302 636 5401

Lehman Brothers Holdings Inc. has knowledge of the subscription of bonds at issue in this case, release of bond funds held in Escrow for allowable end use, monitoring of end use of bond funds and transfer to SSG and VTC.

14. Richard Ruffer

Current address unknown and formerly worked as Director of Kingfisher Capital CLO Limited, the subscribers of the bonds.

Richard has knowledge of subscription of the bonds, release of the bonds held in Escrow for allowable end use, monitoring of end use of bond funds and transfer to SSG and VTC.

15. Mari Dhamodran

Zetland Fiduciary Group Limited
6/F, ING Tower, 308 Des Voeux Road Central, Hong Kong
General Line: (852) 3552 9085 Fax: (852) 2140 6833
Direct Line: (852) 3552 9080

Mani Dhamodran has knowledge of incorporation of PASL, purpose of PASL's formation, and interactions with some of the SSG Defendants and Satish Vuppalapati regarding PASL's operations in Hong Kong.

Rule 26(a)(1)(A)(ii)

A copy--or a description by category and location--of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment;

#	DESCRIPTION OF DOCUMENT	LOCATION
1	Information pertaining to Prithvi Information Solutions Limited derived from its website and the government websites of the Ministry of Corporate Affairs, SEBI, and BSE	Casa Laxmi India Private Limited Office No. 705 A, Suratwala Mark Plaza, S.No. 28, Hinjewadi, Wakad Road, Pune 411057
2	Information pertaining to Privthi Information Solutions Limited and other associate companies including media reports, corporate documents, accounting records, and board of director meetings.	Casa Laxmi India Private Limited Office No. 705 A, Suratwala Mark Plaza, S.No. 28, Hinjewadi, Wakad Road, Pune 411057
3	Reports and documents regarding Equity Shares and Bonds issued by Privthi Information Solutions Limited; Red Herring Prospectus; Bond Circular and related documents.	Casa Laxmi India Private Limited Office No. 705 A, Suratwala Mark Plaza, S.No. 28, Hinjewadi, Wakad Road, Pune 411057
4	Corporate information, publically available business information, and media reports pertaining to the Defendants	Casa Laxmi India Private Limited Office No. 705 A, Suratwala Mark Plaza, S.No. 28, Hinjewadi, Wakad Road, Pune 411057
5	Corporate documents, incorporation documents, communications and emails pertaining to incorporation, Annual Returns of PASL	Casa Laxmi India Private Limited Office No. 705 A, Suratwala Mark Plaza, S.No. 28, Hinjewadi, Wakad Road, Pune 411057
6	Prithvi Solutions Inc.'s corporate documents, incorporation documents, Annual Return, and documents related to Kyko's acquisition	Casa Laxmi India Private Limited Office No. 705 A, Suratwala Mark Plaza, S.No. 28, Hinjewadi, Wakad Road, Pune 411057

	of Prithvi Solutions Inc.	1 Wilkinson Rd, Brampton, ON L6T 4M6
7	Privthi Solutions Inc.'s accounting records, audit reports, financial statements, bank records, books and records relating to accounts receivables.	Casa Laxmi India Private Limited Office No. 705 A, Suratwala Mark Plaza, S.No. 28, Hinjewadi, Wakad Road, Pune 411057 1 Wilkinson Rd, Brampton, ON L6T 4M6
8	Documents, communications and records relating to Foreign Currency Convertible bonds issued by Prithvi Information Solutions Limited, the release of the bonds from Escrow Account, utilization, and related documents.	Casa Laxmi India Private Limited Office No. 705 A, Suratwala Mark Plaza, S.No. 28, Hinjewadi, Wakad Road, Pune 411057
9	Documents relating to the transactions relating to release of bond funds, wire transfers and communications related to same and bank records relating to the transaction.	Casa Laxmi India Private Limited Office No. 705 A, Suratwala Mark Plaza, S.No. 28, Hinjewadi, Wakad Road, Pune 411057
10	Documents relating to bonds, communications between defendants and Prithvi family of entities relating to the bonds including Memorandums of Understanding and Bond Restructuring Agreements.	Casa Laxmi India Private Limited Office No. 705 A, Suratwala Mark Plaza, S.No. 28, Hinjewadi, Wakad Road, Pune 411057
11	Communications among Sojitz, Satish Vuppalapati, Shyam Maheshwari and Dinesh Goel.	Casa Laxmi India Private Limited Office No. 705 A, Suratwala Mark Plaza, S.No. 28, Hinjewadi, Wakad Road, Pune 411057
12	Documentation generated in U.S. District Court for the Western District of Washington Case No. 2:13-cv-1034 – MJP that may be relevant to this case.	Casa Laxmi India Private Limited Office No. 705 A, Suratwala Mark Plaza, S.No. 28, Hinjewadi, Wakad Road, Pune 411057 1 Wilkinson Rd, Brampton, ON L6T 4M6
13	Documentation generated in Washington Superior Court Case No. 13-2-41165-2 SEA that may be relevant to this case.	Casa Laxmi India Private Limited Office No. 705 A, Suratwala Mark Plaza, S.No. 28, Hinjewadi, Wakad Road, Pune 411057 1 Wilkinson Rd, Brampton, ON L6T 4M6
14	Documents from the Hong Kong litigation matter arising from Letters Rogatory issued by Judge Marsha Pechman file no. HCMF	Casa Laxmi India Private Limited Office No. 705 A,

	1082/2017 / CACV 410 / 2019.	Suratwala Mark Plaza, S.No. 28, Hinjewadi, Wakad Road, Pune 411057 1 Wilkinson Rd, Brampton, ON L6T 4M6
15	Documents from Hong Kong litigation between Plaintiffs and SSG Capital Management (Hong Kong) Limited court file no. HCA 1400 / 2019.	Casa Laxmi India Private Limited Office No. 705 A, Suratwala Mark Plaza, S.No. 28, Hinjewadi, Wakad Road, Pune 411057 1 Wilkinson Rd, Brampton, ON L6T 4M6
16	Communication between all defendants relating to bonds, bond transfers, wire transfer and accounting thereof.	Casa Laxmi India Private Limited Office No. 705 A, Suratwala Mark Plaza, S.No. 28, Hinjewadi, Wakad Road, Pune 411057

Rule 26(a)(1)(A)(iii)

A computation of each category of damages claimed by the disclosing party--who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered;

As set forth in the Complaint, Plaintiffs have suffered \$35,000,000 in damages (trebled to \$105,000,000 under RICO) due to the theft of the bond funds. Alternatively, as set forth in the Complaint, Plaintiffs have suffered \$4,000,000 in breach of contract/quasi contract damages against Defendants SSG Capital Partners and SSG Hong Kong; \$18,900,000 in breach of contract/quasi contract damages against Value Team Corporation; and \$35,000,000 in breach of contract damages against PISL.

Rule 26(a)(1)(A)(iv)

For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

None.

Respectfully submitted,

/s/ Joseph F. Rodkey, Jr.

Pa. I.D. No. 66757

FOWKES ♦ RODKEY

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Jayson M. Macyda

Jayson M. Macyda (admitted *pro hac vice*)

Kyko Global, Inc.

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Canton, MI 48187

(248) 243-6685

generalcounsel@kykoglobal.com

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was served via EMAIL on this 4th day of September, 2020 upon the following:

Michael H. Ginsberg
mhginsberg@jonesday.com

John D. Goetz
jdgoetz@jonesday.com

Douglas Baker
ddbaker@jonesday.com

JONES DAY

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Counsel for Defendants:

SSG Capital Partners I, L.P.
SSG Capital Management (Hong Kong) Limited
Shyam Maheshwari
Ira Syavitri Noor a/k/a Ira Noor Vourloumis
Dinesh Goel
Wong Ching Him a/k/a Edwin Wong

Andreas Vourloumis

Value Team Corporation

Jeffrey T. Morris
Elliott & Davis, PC
6425 Living Place, Suite 200
Pittsburgh PA 15206
morris@elliott-davis.com

Counsel for Defendant, Anandhan Jayaraman

The undersigned certifies that a true and correct copy of the foregoing document was served via U.S. Mail for posting on this 4th day of September, 2020 upon the following:

Prithvi Information Solutions, LTD.
Prithvi Asia Solutions Limited

214 S. Craig Street
Suite 5
Pittsburgh, PA 15213

The undersigned certifies that a true and correct copy of the foregoing document was served via Email on this 4th day of September, 2020 upon Madhavi Vuppalapati by sending an email to:

Madhavi@prithvisolutions.com
Vuppalapatim@gmail.com
Satish@prithvisolutions.com
Vuppalapatis@gmail.com
ajayaraman@gmail.com

/s/ Joseph F. Rodkey, Jr.